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Attorneys for Defendant
UNUM LIFE INSURANCE COMPANY OF AMERICA

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA - LAS VEGAS

ROSEANNE BUSEY, an individual,
Plaintiff,

vs.

UNUM LIFE INSURANCE COMPANY OF
AMERICA, a foreign corporation; DOES X
through XX; and ROE CORPORATIONS I
through X, inclusive,
Defendant.

Case No. 2:18-cv-01612-JAD-GWF

**STIPULATION TO EXTEND
MEDIATION DEADLINE AND ALL
OTHER DISCOVERY AND BRIEFING
DATES; [PROPOSED] ORDER**

Judge: Jennifer A. Dorsey

ADR Deadline: March 1, 2019
Prop. New ADR Deadline: April 15, 2019

Complaint Filed: August 27, 2018

**STIPULATION TO EXTEND MEDIATION DEADLINE AND ALL OTHER RELEVANT
DATES; [PROPOSED] ORDER**

UNUM LIFE INSURANCE COMPANY OF AMERICA (“Unum Life”), and ROSEANNE
BUSEY (“Plaintiff”), (collectively referred to herein as the “parties”), by and through their respective
counsel of record, hereby stipulate and request the Court’s agreement to extend the current mediation

1 deadline and all other relevant discovery and briefing dates by an additional 45 days.

2 On January 10, 2019, the parties jointly filed a Proposed Discovery Plan and Proposed
3 Scheduling Order proposing the last day to complete mediation be March 1, 2019. (Doc No. 12).
4 The Court affirmed that deadline in its Scheduling Order (Doc No. 13);

5 The parties have agreed to mediate with a private mediator who is experienced under the
6 Employee Retirement Income Security Act of 1974.

7 The parties agreed to mediate with Adrienne Publicover of JAMS.

8 Given the schedules of the attorneys, the parties and the mediator, the earliest dates on which
9 mediation may take place is March 25, 26 or 27, 2019, in Reno, Nevada.

10 For good cause, the Parties wish to continue the Mediation deadline from March 1, 2019 to
11 April 15, 2019 (45 days) to ensure compliance.

12 The Parties further agree they wish to continue all other discovery and briefing dates to avoid
13 unnecessary litigation costs and to ensure there is no prejudice to either Party due to the extended
14 mediation date.

15 Below is a table indicating the existing deadlines and the proposed new deadlines.

<u>Event</u>	<u>Existing Date</u>	<u>Proposed New Date</u>
Last date to complete mediation	March 1, 2019	April 15, 2019
Last date to File Cross Briefs Regarding Allowance of Expert Discovery	March 18, 2019	May 2, 2019
Last date for Defendant's Filing of Administrative Record	June 21, 2019	August 5, 2019
Last date to file Opening Briefs	July 12, 2019	August 26, 2019
Last date to file Opposition Briefs	August 2, 2019	September 16, 2019
Oral Hearing/Trial Date	August 16, 2019	September 27, 2019

1 The Parties respectfully request that the Court grant the proposed continuation of the
2 mediation deadline and all other dates for the reasons stated. The Parties certify that there have been
3 no prior time modifications for deadlines in this case, and do not believe that this extension sought
4 to continue the mediation deadline and all other dates will prejudice any party or result in undue
5 delay.

6 **IT IS SO STIPULATED.**

7 Dated: January 31, 2019

MAIER GUTIERREZ & ASSOCIATES

Joseph A. Gutierrez

Stephen G. Clough

9 By: /s/ Steven G. Clough

10 Joseph A. Gutierrez

Steven G. Clough

11 Attorneys for Plaintiff

ROSEANNE BUSEY

13 Dated: January 31, 2019

MESERVE, MUMPER & HUGHES LLP

Anna Maria Martin

15 By: /s/ Anna Maria Martin

16 Anna Maria Martin

Attorneys for Defendant

17 UNUM LIFE INSURANCE COMPANY

OF AMERICA

18 **AFFIRMATION**

19
20
21 The undersigned does hereby affirm that the preceding document does not contain the social
22 security numbers of any person. Additionally, the filing attorney attests that she has obtained
23 concurrence regarding the filing of this document and its content from the signatories to this
24 document.

25 **IT IS SO ORDERED:**

26
27 DATED: February 1, 2019.

28 
UNITED STATES MAGISTRATE JUDGE